

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION**

ANITA LANN, et al.,	)	
	)	
<b>Plaintiffs,</b>	)	Civil Action No.: 14-cv-2237 (PJM)
	)	
v.	)	
	)	
TRINITY HEALTH	)	
CORPORATION, et al.,	)	
	)	
<b>Defendants.</b>	)	
	)	

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**MOTION FOR PRELIMINARY APPROVAL OF THE CLASS ACTION SETTLEMENT  
AGREEMENT**

Plaintiffs Anita Lann, Jean Atcherson, Albert R. Chavies, and Thomas Holland (“Named Plaintiffs”), by and through their attorneys, respectfully move the Court for an Order: (1) preliminarily approving the Class Action Settlement Agreement (“Settlement” or “Settlement Agreement”) between the Parties; (2) preliminarily certifying the proposed Settlement Class pursuant to Federal Rules of Civil Procedure 23(b)(1) and/or 23(b)(2); (3) approving the form and method of Class Notice; and (4) setting a date and time for a hearing (the “Fairness Hearing”) for consideration of final approval of the Settlement, of payment of attorneys’ fees and expenses, and of a potential Incentive Award to certain Plaintiffs.

Dated: August 1, 2016

Respectfully submitted,

COHEN MILSTEIN SELLERS & TOLL PLLC

/s/ Michele C. Yau

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and in *Chavez*)

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***Counsel for Plaintiffs***

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that on August 1, 2016, I electronically filed the foregoing Motion for Preliminary Approval and Memorandum in support thereof, with the Declaration of Michelle C. Yau and attachments, using the CM/ECF system, which will automatically send e-mail notification of such filing to the attorneys of record.

Dated: August 1, 2016

/s/ Michelle C. Yau  
Michelle C. Yau